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14
15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 IN RE: OPTICAL DISK DRIVE PRODUCTS
18 ANTITRUST LITIGATION

19 This Document Relates to:

20 DELL INC. and DELL PRODUCTS L.P.

21 Plaintiffs,

22 v.

23 HITACHI-LG DATA STORAGE, INC.;
24 HITACHI-LG DATA STORAGE KOREA, INC.;
25 HITACHI, LTD.; PHILIPS & LITE-ON DIGITAL
26 SOLUTIONS CORP.; PHILIPS & LITE-ON
27 DIGITAL SOLUTIONS USA, INC.; LITE-ON IT
28 CORP. OF TAIWAN; KONINKLIJKE PHILIPS
N.V.; BENQ CORPORATION; BENQ AMERICA
CORP.; SONY CORPORATION; SONY
OPTIARC INC.; NEC CORPORATION; SONY
NEC OPTIARC INC.; SONY OPTIARC
AMERICA INC.; SONY ELECTRONICS, INC.;
TOSHIBA CORPORATION; SAMSUNG

Case No.: 3:13-cv-03350-RS

MDL No. 2143

JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING SERVICE OF
PROCESS

1 ELECTRONICS CO. LTD.; SAMSUNG
2 ELECTRONICS AMERICA, INC.; TOSHIBA
3 AMERICA INFORMATION SYSTEMS, INC.;
4 TOSHIBA SAMSUNG STORAGE
5 TECHNOLOGY CORP.; TOSHIBA SAMSUNG
6 STORAGE TECHNOLOGY CORP. KOREA;

Defendants.

JOINT STIPULATION

It is stipulated by and between the undersigned parties, by their respective attorneys, that:

1. Undersigned counsel of ROPES & GRAY agree to accept service of the Complaint in *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No. 3:13-cv-03350-RS, on behalf of Defendants Hitachi-LG Data Storage, Inc. and Hitachi-LG Data Storage Korea, Inc. (collectively, the “HLDS Defendants”). The HLDS Defendants shall have until Friday, November 22, 2013 to file a response thereto.

2. Undersigned counsel of BAKER BOTTS LLP agree to accept service of the Complaint in *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No. 3:13-cv-03350-RS, on behalf of Defendants Koninklijke Philips N.V. (“Philips”), Lite-On IT Corp. of Taiwan (“Lite-On”), Philips & Lite-On Digital Solutions Corp. (“PLDS”) and Philips & Lite-On Digital Solutions U.S.A., Inc. (“PLDS USA”) (collectively, the “Philips Defendants”). The Philips Defendants shall have until Friday, November 22, 2013 to file a response thereto.

3. Undersigned counsel of DICKSTEIN SHAPIRO LLP agree to accept service of the Complaint in *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No. 3:13-cv-03350-RS on behalf of Defendants BenQ Corporation and BenQ America Corp. (collectively, the “BenQ Defendants”). The BenQ Defendants shall have until Friday, November 22, 2013 to file a response thereto.

4. Undersigned counsel of LATHAM & WATKINS LLP agree to accept service of the Complaint in *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No. 3:13-cv-03350-RS, on behalf of Defendants Toshiba Corporation (“Toshiba Corp.”), Toshiba America Information Systems, Inc. (“TAIS”), Toshiba Samsung Storage Technology Corp. (“TSST”), and Toshiba Samsung Storage Technology Korea Corp. (“TSSTK”). Each of Toshiba Corp., TAIS, TSST and TSSTK shall have until Friday, November 22, 2013 to file a response thereto.

5. Undersigned counsel of O’MELVENY AND MYERS LLP agree to accept service of the Complaint in *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No. 3:13-cv-03350-RS, on behalf of Defendants Samsung Electronics Co. Ltd. (“Samsung”) and

1 Samsung Electronics America, Inc. ("SEA") (collectively, the "Samsung Defendants"). The
2 Samsung Defendants shall have until Friday, November 22, 2013 to file a response thereto.

3 6. Undersigned counsel of WINSTON & STRAWN LLP agree to accept service of the
4 Complaint in *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No.
5 3:13-cv-03350-RS, on behalf of Defendant NEC Corporation ("NEC"). NEC shall have until
6 Friday, November 22, 2013 to file a response thereto.

7
8 IT IS SO STIPULATED.

9 Dated: September 9, 2013

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19 Dated: September 9, 2013

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28 Attorney for Defendants Hitachi-LG Data
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1 Dated: September 9, 2013

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12 N.V., Lite-On IT Corp. of Taiwan, and Philips
13 & Lite-On Digital Solutions Corp., and Philips
14 & Lite-On Digital Solutions U.S.A., Inc.

15 Dated: September 9, 2013

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25 Attorneys for Defendants BenQ Corporation
26 and BenQ America Corp.

27 Dated: September 9, 2013

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1 Dated: September 9, 2013

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10 Dated: September 9, 2013

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Attorney for Defendant NEC Corporation

21 * * *

24 IT IS SO ORDERED.

25 Dated: 9/12/13


RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE